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Application granted on consent.

August 25, 2015

## VIA ECF

Hon. Henry Pitman United States Magistrate Judge United States District Court Southern District of New York 500 Pearl Street New York, NY 10007-1312 UNITED STATES MAGISTRATE JUDGE

8 - 31-15

Re:

Access 4 All, Inc. v. Manhattan LW Hotel Associates, L.P.

Civil Action No.: 1:15-cv-04993-AT

Dear Judge Pitman:

This firm represents Defendant Manhattan LW Hotel Associates, L.P. ("Defendant") in the above-referenced matter. With Plaintiff's consent, we write to respectfully request an extension of time for Defendant to respond to the Complaint. The undersigned has communicated with counsel for Plaintiff, and Plaintiff consents to this request.

The parties are engaged in substantial and meaningful settlement discussions. Defendants are requesting this extension in good faith, in order to pursue a non-litigated resolution of this matter. In their joint letter to Judge Torres, the parties represented that this case presented a "high likelihood of settlement." (Dkt. No.14.)

The present deadline for responding to the Complaint is August 31, 2015. We respectfully request that this deadline be extended by 30 days, up to and including September 30, 2015. This is the second request for an extension of time and it will not affect any scheduled dates. Judge Torres granted Defendant's first request for an extension of this deadline on August 3, 2015 (Dkt. No. 13).

We thank the Court for its time and consideration of this request. Should the Court have any questions, please do not hesitate to contact the undersigned attorney.

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Respectfully submitted,

SEYFARTH SHAW LLP

/s/ John W. Egan John W. Egan

All counsel of record (via ECF) cc: